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Counsel for Stillwater Mining Company

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

In re the Application of)	No. CV-14-19-BLG-SPW
NATALIA POTANINA,)	STILLWATER MINING
)	COMPANY'S UNOPPOSED
For an Order to Take Discovery)	MOTION (1) FOR LEAVE TO
)	FILE SUPPLEMENTAL
Pursuant to 28 U.S.C. § 1782(a))	SUBMISSION AND (2) TO
)	EXTEND PETITIONER'S
)	RESPONSE DATE

Stillwater Mining Company (Stillwater) respectfully moves for leave to file (1) the Supplemental Declaration of Olga A. Dyuzheva dated March 12, 2014 and (2) the Declaration of Yeugenia Shvets dated March 12, 2014 and the attached Exhibit 1 thereto, which is a copy of the Russian language original and certified translation of the decision referenced therein.¹

In support of its motion to vacate this Court's *ex parte* order and quash or stay the subpoena served by Petitioner Natalia Potanina. Stillwater argued in support of its motion to quash/vacate that the date of the parties' separation could affect the appropriateness and/or scope of the discovery Mrs. Potanina is seeking from Stillwater. *See* Dkt. #24 at 18-19. Since Stillwater filed its motion, it has obtained a copy of the February 25, 2014 decision issued by the Russian court in Mrs. Potanina's divorce proceeding and learned that the decision, among other things, establishes the date of the Potanins' separation. Thus, the Russian court's decision and Stillwater's supporting declaration

¹ A copy of the supplemental submission Stillwater proposes to file, including exhibits, is attached hereto as Exhibit A.

explaining the effect of the decision under Russian law are germane to resolution of Stillwater's motion to quash/vacate.

As required by Local Rule 7.1(c)(1), Stillwater's counsel contacted Natalia Potanina's counsel about this motion. Yesterday, undersigned counsel met by telephone with counsel for Petitioner, and, as a result of those discussions, undersigned counsel represent that Petitioner does not oppose this Court granting leave to file (1) the Supplemental Declaration of Olga A. Dyuzheva dated March 12, 2014 and (2) the Declaration of Yeugenia Shvets dated March 12, 2014 and the attached Exhibit 1 thereto, which is a copy of the Russian language original and certified translation of the decision referenced therein. This non-opposition is conditioned upon the Court modifying the briefing schedule such that the deadline for the filing and serving of Petitioner's papers in opposition to Respondent's submission filed and served on Tuesday, March 4, 2014, shall be extended by this Court from Tuesday March 18, 2014, to and including Friday March 21, 2014. Respondent joins in that request to modify the schedule in consideration of Petitioner's non-opposition to this motion.

Dated: March 13, 2014.

Respectfully submitted,

/s/ Jason S. Ritchie

Jason S. Ritchie

/s/ Yeugenia Shvets

Yeugenia Shvets

(admitted pro hac vice)

*Counsel for Stillwater Mining
Company*

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